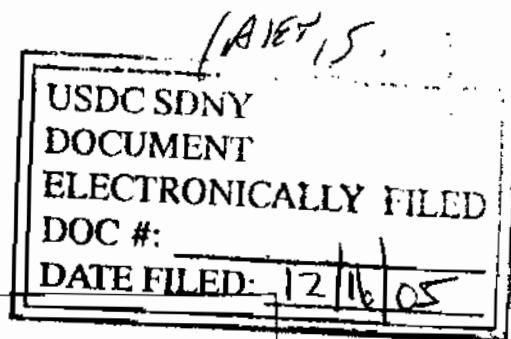


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)
ECF Case

This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)

**STIPULATION AS TO THE INTERNATIONAL ISLAMIC RELIEF
ORGANIZATION'S AMENDED ANSWER ADDING NEW AFFIRMATIVE DEFENSE**

WHEREAS, Defendant International Islamic Relief Organization ("IIRO"), by and through its undersigned counsel, filed its Answer to the *Federal Insurance* Complaint on December 5, 2005;

WHEREAS, IIRO wishes to file an Amended Answer to the *Federal Insurance* Complaint which will include an additional affirmative defense asserting that the IIRO is an instrumentality of the government of the Kingdom of Saudi Arabia and is therefore immune from suit;

WHEREAS, the parties wish to resolve this matter without this Court's intervention;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs in the above-referenced case consolidated under 03 MDL 1570 and Defendant IIRO, by and through their undersigned counsel, that the IIRO shall file its Amended Answer to the *Federal Insurance* Complaint on or before December 26, 2005.

IT IS FURTHER HEREBY STIPULATED AND AGREED that by consenting to the IIRO's Amended Answer and the addition of the above-referenced immunity defense, Plaintiffs are in no way acknowledging and/or conceding that the inclusion of any additional defense in any Amended Answer to the *Federal Insurance* Complaint is substantively or procedurally valid.

IT IS FURTHER HEREBY STIPULATED AND AGREED that nothing herein shall be construed to waive the Plaintiffs' position and/or right to argue that the IIRO has previously waived any defense based on sovereign immunity by failing to raise such defense in IIRO's Motion to Dismiss the *Federal Insurance* Complaint filed on July 30, 2004.

Respectfully submitted.

COZEN O'CONNOR

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Committee*

MARTIN F. MCMAHON & ASSOCIATES

By: /s/

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*Attorneys for Defendant International
Islamic Relief Organization*

SO ORDERED:



RICHARD CONWAY CASEY, U.S.D.J.

Dated: December 16, 2005